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Proposed Attorneys for the Debtor,  
The Roman Catholic Bishop of Fresno

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re

THE ROMAN CATHOLIC BISHOP OF  
FRESNO,

Debtor-In-Possession

Case No. 25-12231-B-11

Chapter 11

DC No.: MB-03

Hearing

Date: July 7, 2025

Time: 10:30 a.m.

Place: Courtroom 13 (Dept. B), Fifth Floor  
United States Bankruptcy Court  
2500 Tulare Street  
Fresno, CA 93721

Judge: Hon. René Lastreto II

*Order Shortening Time*

**EXHIBITS IN SUPPORT OF THE DEBTOR'S MOTION FOR ORDER  
(1) AUTHORIZING THE DEBTOR TO (A) PAY PREPETITION WAGES,  
SALARIES, AND EMPLOYEE EXPENSES, AND (B) PAY ACCRUED EMPLOYEE  
BENEFITS AND TAXES; AND (2) DIRECTING BANKS TO HONOR ALL  
CHECKS AND ELECTRONIC FUND TRANSFER REQUESTS**

The Roman Catholic Bishop of Fresno (the "Debtor" or "RCBF"), the debtor and debtor in possession in the above-captioned bankruptcy case, hereby submits the following exhibits in support of the Debtor's *Motion For Order (1) Authorizing the Debtor to (A) Pay Prepetition Wages,*

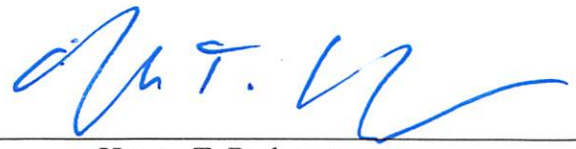
Salaries, and Employee Expenses, and (B) Pay Accrued Employee Benefits and Taxes; and (2) Directing Banks to Honor All Checks and Electronic Fund Transfer Requests:

Exhibit	Description	Pages
A	[Proposed] Order Granting Motion For Order (1) Authorizing Payment of Prepetition Wages, Salaries, and Employee Expenses; (2) To Pay Accrued Employee Benefits and Taxes; and (3) Directing Banks to Honor All Checks and Electronic Fund Transfer Requests	3-8

Dated: July 1, 2025

MCCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By:



Hagop T. Bedoyan  
Mart B. Oller IV  
Garrett R. Leatham  
Garrett J. Wade

Proposed Attorneys for the Debtor,  
The Roman Catholic Bishop of Fresno

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# EXHIBIT ‘A’

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re

THE ROMAN CATHOLIC BISHOP OF  
FRESNO,

Debtor-In-Possession

Case No. 25-

Chapter 11

DC No.: MB-03

Hearing

Date: July 7, 2025

Time: 10:30 a.m.

Place: Courtroom 13 (Dept. B) Fifth Floor  
United States Bankruptcy Court  
2500 Tulare Street  
Fresno, CA 93721

Judge: Hon. René Lastreto II

*Order Shortening Time*

**ORDER GRANTING THE DEBTOR'S MOTION FOR ORDER (1) AUTHORIZING  
THE DEBTOR TO (A) PAY PREPETITION WAGES, SALARIES, AND EMPLOYEE  
EXPENSES, AND (B) PAY ACCRUED EMPLOYEE BENEFITS AND TAXES;  
AND (2) DIRECTING BANKS TO HONOR ALL CHECKS AND  
ELECTRONIC FUND TRANSFER REQUESTS**

The motion of The Roman Catholic Bishop of Fresno (the "Debtor"), for an order (1)  
authorizing payment of prepetition wages, salaries, and employee expenses; (2) to pay accrued  
employee benefits and taxes; and (3) directing banks to honor all checks and electronic fund transfer

1 requests (the "Motion") came on for hearing on an interim basis on July 7, 2025, at 10:30 a.m. before  
2 the Honorable René Lastreto II in Courtroom 13 of the United States Bankruptcy Court for the  
3 Eastern District of California. The Debtor appeared through its counsel, Hagop T. Bedoyan of  
4 McCormick, Barstow, Sheppard, Wayte & Carruth LLP. Other appearances were noted on the  
5 record. All capitalized terms used but not defined in this Order shall have the meanings given to  
6 them in the Motion.

7 The Court, having considered the *Declaration of Cynthia Martin in Support of Chapter 11*  
8 *Petition and First Day Motions* ("Martin Background Decl."), the *Declaration of Cynthia Martin* in  
9 support of this Motion ("Martin Decl."), the *Declaration of Mart B. Oller, IV, in Support of Chapter*  
10 *11 Petition and First Day Motions* ("Oller Background Decl."), and the matters reflected in the  
11 record of the hearing, and the Court having found that it has jurisdiction over this proceeding; that  
12 this is a core proceeding; that notice of the Motion has been given to the Office of the United States  
13 Trustee, the twenty (20) largest unsecured creditors, all secured creditors (if any), and any applicable  
14 governmental entities; that no further notice is necessary; the Court finding that there is good cause  
15 for entry of an immediate interim order pursuant to Fed. R. Bankr. P. 6003 to the extent applicable,  
16 and that ample cause exists to grant waiver of the 14-day stay imposed by Fed. R. Bankr. P. 6004(h)  
17 to the extent applicable; that the relief sought in this Motion is in the best interests of the Debtor, its  
18 estate, and its creditors, and that good and sufficient cause exists for such relief,

19 **IT IS HEREBY ORDERED** as follows:

- 20 1. The Motion is GRANTED on an interim basis as provided herein.
- 21 2. The Debtor is authorized, but not directed, to pay to its Employees or on behalf of its  
22 Employees all Employee Obligations, Employee Deductions, and Employee Expenses that have  
23 accrued by virtue of the services rendered by its Employees prior to the Petition Date up to the  
24 amounts entitled to priority claim status under 11 U.S.C. § 507(a). The Employee Obligations,  
25 Employee Deductions, and Employee Expenses that the Debtor is authorized to pay are described  
26 in the Motion and include, without limitation, the following: wages, salary, retirement, healthcare,  
27 and other benefit programs up to the amount entitled to priority claim status under 11 U.S.C.  
28 § 507(a).

1           3.       The Debtor is authorized, but not directed, to pay all local, state, and federal  
2 withholding and payroll taxes (including those accrued for pre-petition periods) or have such taxes  
3 paid by third-party payroll administrators and pay related employment expenses for unemployment  
4 claims/taxes and payroll processing fees.

5           4.       The Debtor is authorized, but not directed, to continue its practices, programs, and  
6 policies in effect as of the Petition Date as described in the Motion, including with respect to all  
7 Employee Obligations (including allowing employees to use time off accrued, but unused, as of the  
8 Petition Date) up to the amounts entitled to priority claim status under the provisions of 11 U.S.C.  
9 § 507(a) and administering payroll for the Payroll Participating Entities and insurance for the Health  
10 Insurance Participating Entities.

11           5.       The Debtor is authorized to pay, upon termination of employment, the value of all  
12 unused PTO accrued within 180 days prior to the Petition Date provided that the amounts of unused  
13 PTO for any such terminated employee do not exceed the priority cap of \$17,150 per claim in 11  
14 U.S.C. § 504(a)(4)(A), less prepetition Employee Compensation otherwise paid pursuant to  
15 paragraph 2 of this Order, except for reimbursement of prepetition Employee Expenses.

16           6.       The banks at which the Debtor maintains accounts from which the Debtor's payroll  
17 obligations are disbursed and all other banks or lending institutions maintaining payroll and  
18 employee benefits accounts are authorized and directed to honor and pay all prepetition and  
19 postpetition checks issued or to be issued and fund transfers requested or to be requested by the  
20 Debtor in respect of the Employee Obligations, Employee Deductions, and Employee Expenses and  
21 related employment expenses for unemployment claims/taxes and payroll processing fees.

22           7.       The Debtor is authorized, but not directed, to issue new postpetition checks or fund  
23 transfer requests with respect to prepetition obligations that may have been dishonored by the banks  
24 relating to the Employee Obligations, Employee Deductions, and Employee Expenses, if necessary,  
25 to the extent such are up to the amounts entitled to priority claim status under 11 U.S.C. § 507(a).

26           8.       The Debtor is authorized, but not directed, to continue to administer the Employee  
27 Benefits, Employee Deductions, Health Plans, and Retirement Plans.

28       ///

1           9.       Nothing in this Order authorizes the Debtor to make any payments that benefit,  
2 directly or indirectly, any credibly accused perpetrator of abuse, whether for wages, support,  
3 housing, prepetition claims, retirement, or otherwise, except for vested pension benefits to which  
4 the Debtor has no discretion, that are paid consistent with the Debtor's past practices.

5           10.      The Debtor shall provide the U.S. Trustee a list of any Employees to be paid  
6 prepetition wages or expense reimbursement under this Order including accrual dates and amounts  
7 to be paid to each Employee and shall file with the Court a summary of the information. If the U.S.  
8 Trustee notifies the Debtor within three business days that it objects to the payment of any  
9 prepetition expense reimbursement, the Debtor shall not reimburse the business expense and may  
10 seek court authorization to reimburse the expenses at the final hearing on this Motion or at another  
11 time.

12           11.      This Order shall be immediately effective and enforceable upon entry. To the extent  
13 the fourteen (14) day stay of Fed. R. Bankr. P. 6004(h) may be construed to apply to the subject  
14 matter of this Interim Order, such stay is hereby waived.

15           12.      The final hearing on this Motion shall be heard on \_\_\_\_\_, 2025,  
16 at \_\_\_\_\_. Opposition, if any, to the granting of the Motion on a final basis shall  
17 be filed by \_\_\_\_\_, 2025, with the Clerk of the Bankruptcy Court and served  
18 upon counsel for the Debtor, counsel to the secured creditors (if any), the Office of the United States  
19 Trustee for the Eastern District of California, and counsel to any statutory committee(s) appointed  
20 in this case. The Debtor's reply to any opposition may be filed in advance of or raised at the hearing.  
21 If no objections are filed to the Motion, the Court may enter the Final Order without further notice  
22 or hearing.

23           13.      Counsel for the Debtor is directed to serve a copy of this Order on all parties on the  
24 Limited Service List as defined in the Debtor's *Motion for Order Establishing Notice Procedures*  
25 *and to File Confidential Information Under Seal* on file herein within three (3) court days of the  
26 entry of this Order and to file a certificate of service with the Clerk of the Court.

27           14.      Notwithstanding the relief granted herein and any actions taken pursuant hereto,  
28 nothing herein shall be deemed: (i) an admission as to the validity of any claim against the Debtor;

1 (ii) waiver of the Debtor's rights to dispute any claim on any grounds; (iii) a promise or requirement  
2 to pay any claim; (vi) an implication or admission that any particular claim is of a type specified or  
3 defined hereunder; (v) a request or authorization to assume any agreement, contract, or lease  
4 pursuant to 11 U.S.C. § 365; or (vi) a waiver of the Debtor's rights under the Bankruptcy Code or  
5 any other applicable law.

6 15. The Debtor and its employees and agents are authorized to take or refrain from taking  
7 such acts as necessary and appropriate to implement and effectuate the relief granted herein.

8 16. Any applicable stay of this Order pursuant to Fed. R. Bankr. P. 6004 is hereby waived  
9 to the extent necessary to comply with this Order.

10 17. The Court shall retain jurisdiction over all matters arising from or related to the  
11 interpretation or implementation of this Order.

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